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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINALEO LIONEL PAYNE

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**-against-**

JESSICA MANGUM, ACTING  
UNDER COLOR OF STATE LAW.

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)*

**Complaint for Violation of Civil Rights**

(Non-Prisoner Complaint)

Case No. \_\_\_\_\_  
(to be filled in by the Clerk's Office)Jury Trial: ☐ Yes ☒ No  
(check one)**NOTICE**

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed *in forma pauperis*.

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name LEO L. PAYNE  
Street Address 2648 TWO NOTCH RD.  
City and County COLUMBIA, RICHLAND.  
State and Zip Code SC, 29204.  
Telephone Number (803) 757-6422

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

## Defendant No. 1

Name JESSICA MANGUM  
Job or Title PROSECUTING ATTORNEY  
(if known)  
Street Address P.O. BOX 667  
City and County COLUMBIA, RICHLAND.  
State and Zip Code SC, 29202.  
Telephone Number (803) 737-4242  
☒ Individual capacity ☐ Official capacity

## Defendant No. 2

Name \_\_\_\_\_  
Job or Title \_\_\_\_\_  
(if known)  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

☐ Individual capacity☐ Official capacity

## Defendant No. 3

Name \_\_\_\_\_

Job or Title  
(if known) \_\_\_\_\_

Street Address \_\_\_\_\_

City and County \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

☐ Individual capacity☐ Official capacity

## Defendant No. 4

Name \_\_\_\_\_

Job or Title  
(if known) \_\_\_\_\_

Street Address \_\_\_\_\_

City and County \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

☐ Individual capacity☐ Official capacity**II. Basis for Jurisdiction**

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (*check all that apply*):

☐ Federal officials (a *Bivens* claim)☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If

you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

1. THE RIGHT TO DUE PROCESS, 2. RIGHT TO EQUAL PROTECTION, 3. RIGHT TO THE PRIVILEGES OR IMMUNITIES OF NATIONAL CITIZENSHIP, 14TH AMENDMENT AND 18 USC. 242.

- C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

MS. MANGUM DEPRIVED MY RIGHT TO THE PRIVILEGES OR IMMUNITIES OF NATIONAL CITIZENSHIP FROM 4/27/2014 TO 10/27/2016., UNDER COLOR OF STATE LAW.  
(SEE ATTACHMENTS)  
EVIDENTIARY SUPPORT

### III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

GREYHOUND BUS STATION  
2015 GERVAIS STREET  
COLUMBIA, SC 29201

- B. What date and approximate time did the events giving rise to your claim(s) occur?

APRIL 26, 2014. TIME - 10:48 AM (BUS TICKET).

(SEE ATTACHMENT COPY)  
EVIDENTIARY SUPPORT

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

MS. MANGUM IS ENTRUSTED BY THE STATE OF SOUTH CAROLINA TO PERFORM FUNCTIONS THAT ARE "GOVERNMENTAL IN NATURE," IS AN AGENT OF THE STATE UNDER THE "PUBLIC FUNCTION" DOCTRINE. MS. MANGUM CONDUCT CONSTITUTE STATE ACTION, THE STATE IS "HEAVILY INVOLVED" IN HER ACTIVITIES., "STATE INVOLVEMENT", 1. THE STATE IS RESPONSIBLE FOR MS. MANGUM ACTIONS BECAUSE IT COMMANDED HER TO ACT IN (THAT) WAY. THE STATE LENT ITS STATE JUDICIAL ENFORCEMENT MECHANISM TO MS. MANGUM, THE COMBINATION OF ENFORCEMENT AND PRIVATE DISCRIMINATION VIOLATES EQUAL PROTECTION. 2. THE STATE IS SO "ENTANGLED OR ENTWINED" WITH MS. MANGUM BECAUSE THE STATE AND HER ACTED TOGETHER TO CARRY OUT THE ACTION BEING CHALLENGED.

IV. Injuries

(CONTINUE)

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

PLAINTIFF SUSTAINED DIRECT INJURY RESULTING DIRECTLY FROM MS. MANGUM (STATE OF SOUTH CAROLINA) VIOLATION OF A LEGAL RIGHT CREATED OR RECOGNIZED BY LAW., AND MALICIOUS INJURY RESULTING FROM MS. MANGUM WILLFUL ACT COMMITTED WITH KNOWLEDGE THAT IT IS LIKELY TO INJURE PLAINTIFF WITH RECKLESS DISREGARD OF THE CONSEQUENCES.

### III. STATEMENT OF CLAIM, C. <sup>#</sup>

THE RIGHT TO TRAVEL IS A FUNDAMENTAL RIGHT. THIS TERM "RIGHT TO TRAVEL" IS MIS-LEADING..... IT'S REALLY THE RIGHT TO CHANGE ONE'S STATE OF RESIDENCE. 14<sup>TH</sup> AMENDMENT PRIVILEGES OR IMMUNITIES CLAUSE: (1.) NATIONAL RIGHTS ONLY., PROTECTS THE PLAINTIFF FROM STATE (MS. MANGUM) ~~INTERFERE~~ INTERFERENCE WITH PLAINTIFF RIGHTS OF HIS "NATIONAL" CITIZENSHIP. THE MOST IMPORTANT OF THESE RIGHTS OF "NATIONAL" CITIZENSHIP ARE: (1). THE RIGHT TO TRAVEL FROM STATE TO STATE., WHICH IS PROTECTED BY THE EQUAL PROTECTION CLAUSE. (2.) RIGHT TO CHANGE STATE OF RESIDENCE. (3.) STRICT SCRUTINY: THE COURT GIVES "STRICT SCRUTINY" TO STATE LAWS THAT INTERFERE WITH THE RIGHTS OF THE PLAINTIFF NATIONAL CITIZENSHIP.

THE MAIN ASPECT OF THE 14<sup>TH</sup> AMENDMENT'S DUE PROCESS CLAUSE; IS THE REQUIREMENT THAT THE STATE ACT WITH ADEQUATE OR FAIR PROCEDURES WHEN IT DEPRIVED PLAINTIFF OF "LIBERTY"., PHYSICAL LIBERTY INTEREST IS VIOLATED WHEN PLAINTIFF WAS IMPRISONED FOR TWO (2) MONTHS.

- (1). SEE ATTACHMENTS.,  
EVIDENTIARY SUPPORT.



MS. MANGUM, WAS PROSECUTING PLAINTIFF AS,  
THE STATE OF SOUTH CAROLINA IN # CASE 11803GT.  
THE VICTIM, IN THE CASE SOLD PLAINTIFF THE BUS  
TICKET TO WASHINGTON, DC ON APRIL 26, 2014.  
PLAINTIFF HAD AN LEGAL RIGHT TO BE ON THE  
PREMISES, BECAUSE OF THE GREYHOUND, INC., BUS  
TICKET THAT GAVE PLAINTIFF AUTHORIZATION TO BE  
ON THE PROPERTY TO CHANGE ONE'S STATE RESIDENCE.

MS. MANGUM CRIMINAL PROCEEDINGS AGAINST  
PLAINTIFF HELD A MALICIOUS PROSECUTION FOR AN  
IMPROPER PURPOSE AND WITHOUT PROBABLE CAUSE.,  
THIS MALICIOUS ACT BY MS. MANGUM WAS AN  
INTENTIONAL, WRONGFUL ACT DONE WILLFULLY AND  
INTENTIONALLY AGAINST PLAINTIFF WITHOUT  
LEGAL JUSTIFICATION OR EXCUSE, RECKLESS  
DISREGARD OF THE LAW AND OF ~~THE~~ PLAINTIFF LEGAL  
RIGHTS. SEE ATTACHMENTS: WAIVER, CASE # 11803GT,  
(EVIDENTIARY SUPPORT)  
GREYHOUND LINES, INC. BUS TICKET COPY.

(2).

**V. Relief**

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

PLAINTIFF REQUEST \$15 MILLION DOLLARS FROM DEFENDANT  
FOR PAIN AND SUFFERING ACTUAL DAMAGES, AND PUNITIVE  
DAMAGES IN ADDITION TO ACTUAL DAMAGES WHEN MS. MANGUM  
ACTED WITH RECKLESSNESS, AND MALICE.

PRAYER FOR RELIEF.

**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 10/20, 2021

Signature of Plaintiff LED L. Payne

Printed Name of Plaintiff LED L. PAYNE



**B. For Attorneys**

Date of signing: \_\_\_\_\_, 20\_\_.

Signature of Attorney \_\_\_\_\_

Printed Name of Attorney \_\_\_\_\_

Bar Number \_\_\_\_\_

Name of Law Firm \_\_\_\_\_

Address \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address \_\_\_\_\_